

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	CRIMINAL NO. <b>4:04CR40015-NMG</b>
v.	)	VIOLATIONS:
	)	18 U.S.C. § 371
JONATHAN "SHORTY" VEGA, and	)	(Conspiracy to possess
TODD HICKEY	)	stolen firearms)
	)	18 U.S.C. § 922(j)-
Defendants	)	(Possession of stolen
	)	firearms)

INDICTMENT

COUNT ONE: (18 U.S.C. § 371 - Conspiracy to Possess Stolen Firearms)

The Grand Jury charges that:

1. From on or about April 28, 2004 and continuing thereafter, at Worcester and Charlton, Massachusetts, in the District of Massachusetts, and elsewhere

**JONATHAN "SHORTY" VEGA, and  
TODD HICKEY,**

defendants herein, did unlawfully, willfully, and knowingly conspire, combine, confederate, and agree together and with each other to knowingly receive, possess, conceal, store, and dispose of stolen firearms, to wit: a Mossberg pump action 12 gauge shotgun, bearing serial number J787186; and a Marlin .22 caliber rifle, bearing serial number 16385829, which has been shipped and transported in interstate and foreign commerce, either before or after they were stolen, knowing and having reasonable cause to believe the firearms were stolen, in violation of Title 18, United States Code, Section 922(j).

**GENERAL ALLEGATIONS**

At all relevant times:

2. JONATHAN "SHORTY" VEGA resided at 107 Granite Street, Apartment Second Floor, Left, in Worcester, Massachusetts.

3. TODD HICKEY resided at 107 Granite Street, Apartment Second Floor, Left, in Worcester, Massachusetts.

**MANNER AND MEANS BY WHICH THE CONSPIRACY WAS CARRIED OUT**

The manner and means by which the conspiracy was sought to be accomplished included, among others, the following:

4. JONATHAN "SHORTY" VEGA and TODD HICKEY agreed to steal firearms, which were located at HICKEY's cousin's residence, in Charlton, Massachusetts, a location where both JONATHAN "SHORTY" VEGA and TODD HICKEY previously visited.

5. JONATHAN "SHORTY" VEGA and TODD HICKEY traveled by automobile from Worcester to 44 Gould Road, in Charlton, Massachusetts ("the premises").

6. JONATHAN "SHORTY" VEGA and TODD HICKEY broke a cellar window and entered the premises.

7. JONATHAN "SHORTY" VEGA and TODD HICKEY found two firearms within the premises.

8. JONATHAN "SHORTY" VEGA and TODD HICKEY removed the weapons from the premises, placed them in an automobile, and returned to Worcester, where they disposed of the weapons.

**OVERT ACTS**

In furtherance of the conspiracy and to effect the objects thereof, the following overt acts were committed in the District of Massachusetts, and elsewhere:

9. On or about April 28, 2004, JONATHAN "SHORTY" VEGA and TODD HICKEY met in Worcester, Massachusetts.

10. On or about April 28, 2004, TODD HICKEY via automobile traveled with JONATHAN "SHORTY" VEGA from Worcester, Massachusetts to 44 Gould Road, in Charlton, Massachusetts.

11. On or about April 28, 2004, JONATHAN "SHORTY" VEGA and TODD HICKEY broke and entered 44 Gould Road, in Charlton, Massachusetts.

12. On or about April 28, 2004, JONATHAN "SHORTY" VEGA and TODD HICKEY found two firearms, to wit: a Mossberg pump action 12 gauge shotgun, bearing serial number J787186; and a Marlin .22 caliber rifle, bearing serial number 16385829, within 44 Gould Road, in Charlton, Massachusetts, carried them away, and placed them into an automobile.

13. On or about April 28, 2004, JONATHAN "SHORTY" VEGA and TODD HICKEY departed from Charlton, Massachusetts, and returned to Worcester, Massachusetts, where they disposed of the firearms.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO: (18 U.S.C. § 922(j)- Possession of Stolen Firearms)

The Grand Jury charges that:

On or about April 28, 2004, at Charlton and Worcester, in the District of Massachusetts,

**JONATHAN "SHORTY" VEGA, and  
TODD HICKEY,**

the defendants herein, did knowingly receive, possess, conceal, store, and dispose of stolen firearms, to wit: a Mossberg pump action 12 gauge shotgun, bearing serial number J787186; and a Marlin .22 caliber rifle, bearing serial number 16385829, which has been shipped and transported in interstate and foreign commerce, either before or after they were stolen, knowing and having reasonable cause to believe the firearms were stolen.

All in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

A TRUE BILL

Thomas E. Joyce  
Foreperson of the Grand Jury

John M. Hodgins, Jr. 6/2/04  
John M. Hodgins, Jr.  
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS:

June 2, 2004

Returned into the District Court by the Grand Jurors and filed.

MA Castle 11:59 AM  
Deputy Clerk

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Worcester Category No. II Investigating Agency ATFCity Charlton Related Case Information:County Worcester Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
Magistrate Judge Case Number 04-1735-CBS  
Search Warrant Case Number 04-1736-CBS  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Jonathan Vega Juvenile ☐ Yes ☒ NoAlias Name "Shorty"Address 107 Granite Street, Apt 2<sup>nd</sup> Floor, Left, Worcester, MABirth date (Year only): 1983 SSN (last 4 #): 2315 Sex M Race: W Nationality: USADefense Counsel if known: JAMES DILDAY, ESQ. Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA John M. Hodgens, Jr. Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☒ Regular Process ☐ In Custody**Location Status:**Arrest Date: 5/13/04☒ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☒ On Pretrial Release: Ordered by Swartwood, U.S.M.J. on 5/13/04Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 6/2/04 Signature of AUSA: John M. Hodgens, Jr.

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Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
Magistrate Judge Case Number 04-1735-CBS  
Search Warrant Case Number 04-1736-CBS  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Todd Hickey Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address 107 Granite Street, Apt 2<sup>nd</sup> Floor, Left, Worcester, MABirth date (Year only): 1971 SSN (last 4 #): 0780 Sex M Race: W Nationality: USADefense Counsel if known: Raymond O'Hara, Esq. Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA John M. Hodgins, Jr. Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☒ Regular Process ☒ In Custody**Location Status:**Arrest Date: 5/13/04☒ Already in Federal Custody as \_\_\_\_\_ in Wyatt☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 2

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